

**SAN JOAQUIN VALLEY
AIR POLLUTION CONTROL DISTRICT

CHEVRON U. S. A., INCORPORATED

FINAL ENGINEERING EVALUATION

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TITLE V APPLICATION REVIEW

Project #: 960999
Deemed Complete: July 14, 1997

Engineer: Douglas Shaffer
Date: May 15, 2002

Facility Number: S-1129
Facility Name: Chevron U.S.A., Incorporated
Mailing Address: P.O. BOX 1392
BAKERSFIELD, CA 93302

Contact Name: Martin Lundy
Phone: (661) 633 4458

Responsible Official: G. P. Luquette
Title: Vice President

I. PROPOSAL

Texaco Exploration & Production Inc. originally owned this facility. Since issuance of Preliminary Notice on March 22, 2002, Chevron U.S.A., Inc has officially changed the name of this facility (refer to District project S-1020447). Therefore, Chevron U.S.A., Inc. is proposing that an initial Title V permit be issued for its existing Heavy Oil Western Source facility in Kern County, Ca. The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with those applicable requirements, and to provide the legal and factual basis for proposed permit conditions.

II. FACILITY LOCATION

Chevron U.S.A., Inc. is located at Heavy Oil Western in Kern County.

III. EQUIPMENT LISTING

A detailed facility printout listing all permitted equipment at the facility is shown in Attachment A.

A summary of the exempt equipment categories which describe the insignificant activities or equipment at the facility not requiring a permit is shown in Attachment B. This equipment is not exempt from facility-wide requirements.

IV. GENERAL PERMIT TEMPLATE USAGE

The applicant is requesting to use the following model general permit Templates:

A. SJV-UM-0-1, Facility-wide Umbrella General Permit template

The applicant has requested to utilize template SJV-UM-0-1, Umbrella General Permit Template, for the entire facility. Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

B. SJV-GT-7-0, Series 7 Gas Turbine

The applicant has requested to utilize template SJV-GT-7-0, Series 7 Gas Turbine, for units -47, -48, -49, -53, -54, and -55. Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

V. SCOPE OF EPA AND PUBLIC REVIEW

Certain segments of the proposed Operating Permit are based on model general permit templates that have been previously subject to EPA and public review. The terms and conditions from the model general permit templates are included in the proposed permit and are not subject to further EPA and public review.

For permit applications utilizing model general permit templates, public and agency comments on the District's proposed actions are limited to the applicant's eligibility for model general permit template, applicable requirements not covered by the model general permit template, and the applicable procedural requirements for issuance of Title V Operating Permits.

The following permit conditions, including their underlying applicable requirements, originate from model general permit templates and are not subject to further EPA and Public review:

Conditions 1 through 30 and 36 through 41 of the Facility Wide requirements (S-1129-0)

Conditions 1 through 21 of the requirements for permit units S-1129-47, -48, and -49

Conditions 1 through 20 of the requirements for permit units S-1129-53, -54 and -55

VI. APPLICABLE REQUIREMENTS ADDRESSED BY GENERAL PERMIT TEMPLATES

District Rule 1081 Source Sampling (Amended December 16, 1993)¹

District Rule 1100 Equipment Breakdown (Amended December 17, 1992) (Non SIP replacement for Kern County Rule 111)²

District Rule 1160 Emission Statements (Adopted November 18, 1992, 1992)²

District Rule 2010 Permits Required (Amended December 17, 1992)²

District Rule 2020 Exemptions (Amended July 21, 1994) (Non SIP replacement for Kern County Rule 202)²

District Rule 2031 Transfer of Permits (Amended December 17, 1992)²

District Rule 2040 Applications (Amended December 17, 1992)²

District Rule 2070 Standards for Granting Applications (Amended December 17, 1992)²

District Rule 2080 Conditional Approval (Amended December 17, 1992)²

District Rule 2520 Federally Mandated Operating Permits (Adopted June 15, 1995)¹, Sections 9.4.2 and 9.5.2

District Rule 2520 Federally Mandated Operating Permits (Adopted June 15, 1995)², Sections 9.5.1, 9.5.2, 9.6.1, 9.6.2, 9.8, 9.9.1, 9.9.2, 9.9.3, 9.9.4, 9.9.5, 9.10, 9.13.1, 9.14.1, 9.14.2, 9.17, and 10.0

¹ General Permit Template SJV-GT-7-0 addresses this requirement only for permit units listed in Section IV.B

² The Umbrella General Permit Template addresses this requirement for all permit units at the facility

District Rule 4101 Visible Emissions (Amended December 17, 1992) (Non SIP replacement for Kern County Rule 401)²

District Rule 4201 Particulate Matter Concentration (Amended December 17, 1992)¹ (Non SIP replacement for Kern County Rule 404)

District Rule 4601 Architectural Coatings (Amended September 17, 1997)²

District Rule 4801 Sulfur Compounds (Amended December 17, 1992)³ (Non SIP replacement for Kern County Rule 407)

District Rule 8020 Fugitive Dust Requirements for Control of Fine Particulate Matter (PM-10) from Construction, Demolition, Excavation, and Extraction Activities (Amended April 25, 1996)⁴

District Rule 8030 Fugitive Dust Requirements for Control of Fine Particulate Matter (PM-10) from Handling and Storage of Bulk Materials (Amended April 25, 1996)⁴

District Rule 8060 Fugitive Dust Requirements for Control of Fine Particulate Matter (PM-10) from Paved and Unpaved Roads (Amended April 25, 1996)⁴

40 CFR Part 60 Subpart A General Provisions - Excess Emission Reports, Conducting Performance Tests, Continuous Emission Monitor Requirements³

40 CFR Part 60 Subpart GG Standards for Performance of Stationary Gas Turbines³

40 CFR Part 61 Subpart M National Emission Standard for Asbestos⁴

40 CFR Part 82 Subpart F Stratospheric Ozone⁴

VII. APPLICABLE REQUIREMENTS NOT ADDRESSED BY GENERAL PERMIT TEMPLATES

District New and Modified Stationary Source Review Rule

District Rule 1081 Source Sampling (Amended December 16, 1993)

District Rule 2080 Conditional Approval (Amended December 17, 1992) (Non SIP replacement for Kern County Rule 209)

District Rule 2520 Federally Mandated Operating Permits (Adopted June 15, 1995) Sections 9.0, 9.4.2, 9.5.2

District Rule 4201 Particulate Matter Concentration (Amended December 17, 1992) (Non SIP replacement for Kern County Rule 404)

District Rule 4301 Fuel Burning Equipment (Amended December 17, 1992)

District Rule 4401 Steam-Enhanced Crude Oil Production Well Vents (Amended January 15, 1998)

District Rule 4407 In-Situ Combustion Well Vents (Adopted May 19, 1994)

District Rule 4621 Gasoline Transfer into Stationary Storage Containers, Delivery Vessels, and Bulk Plants (Amended June 18, 1998)

³ General Permit Template SJV-GT-7-0 addresses this requirement only for permit units listed in Section IV.B

⁴ The Umbrella General Permit Template addresses this requirement for all permit units at the facility

District Rule 4622 Transfer of Gasoline into Vehicle Fuel Tanks (Amended June 18, 1998)

District Rule 4623 Storage of Organic Liquids (Amended December 17, 1992)

District Rule 4801 Sulfur Compounds (Amended December 17, 1992) (Non SIP replacement for Kern County Rule 407)

Kern County Rule 407 Sulfur Compound Emissions

Kern County Rule 424 Sulfur Compounds From Oil Field Steam Generator

40 CFR Part 60 Subpart A General control device requirements

40 CFR Part 60 Subpart K Standards of Performance for Storage Vessels for Petroleum Liquids...

40 CFR Part 60 Subpart Ka Standards of Performance for Storage Vessels for Petroleum Liquids...

40 CFR Part 60 Subpart Kb Standards of Performance for Storage Vessels for Petroleum Liquids...

40 CFR Part 60 Subpart GG Standards of Performance for Stationary Gas Turbines

40 CFR Part 63 Subpart HH National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities

40 CFR Part 68 Chemical Accident Prevention Provisions

VIII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

For each Title V source, the District issues a single permit that contains the Federally Enforceable requirements, as well as the District-only requirements. The District-only requirements are not a part of the Title V Operating Permits. The terms and conditions that are part of the facility's Title V permit are designated as "Federally Enforceable Through Title V Permit".

This facility is subject to the following rules that are not currently federally enforceable:

- District Rule 1070 Inspections
- District Rule 4102 Nuisance
- California Health and Safety Code, Section 42301.6(f)

For this facility the following conditions are **District-only requirements** and are not Federally Enforceable through Title V: condition 42 of the facility wide requirements; conditions 12 and 13 of permit units -20 and -57.

IX. COMPLIANCE

A. Requirements Addressed by Model General Permit Templates

1. Facility Wide Requirements

The applicant is proposing to use a general permit template to address federally applicable facility-wide requirements. Section IV of template SJV-UM-0-1 includes a demonstration of compliance for all applicable requirements. Template conditions have been added to the facility wide requirements as condition numbers 1 through 30 and 36 through 41 to assure compliance with these requirements.

2. Gas Turbine Engines

The applicant is proposing to use general permit templates to address federally applicable requirements for the gas turbine cogeneration units. Section IV of template SJV-GT-7-0 includes a demonstration of compliance for applicable requirements.

To assure compliance with federally applicable requirements, template conditions have been added to the requirements for permit units S-1129-47, -48, and -49 as conditions 1 through 20, and permit units S-1129-53, -54 and -55 as conditions 1 through 19.

Due to the general nature of templates, general permit template conditions 1, 2 and 4 have been streamlined in the template requirements, and general permit template conditions 10 and 22 have been deleted from the template requirements for these permit units.

Due to more stringent conditions on the existing Permits To Operate (PTOs) S-1129-47, -48, -49, -53, -54 and -55, general permit template conditions 19, 21, 22 and 23 have been streamlined in the template requirements, and general permit template condition 3 has been deleted from the template requirements for these permit units.

B. Requirements Not Addressed by Model General Permit Templates

1. New and Modified Stationary Source Review Rule (District NSR Rule)

a. Steam Generators (S-1129-16, -24)

These units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO specifies emission limits pursuant to District Rule 4101 and was addressed in Umbrella Permit General Template condition 22.
- Condition 2 from the PTO specifies emission limits pursuant to District Rule 4301 and is included as condition 4 of the requirements for these permit units.
- Conditions 3, 4 and 5 from the PTO specify proper operational conditions pursuant to the District NSR Rule and are included as conditions 12, 13 and 14 of the requirements for these permit units.
- Conditions 6, 7 and 8 from the PTO provide monitoring and record keeping requirements pursuant to District Rule 2520 and are included as conditions 15, 16 and 17 of the requirements for these permit units.
- Conditions 9 through 16 from the PTO specify proper operational conditions pursuant to the District NSR Rule and are included as conditions 18 through 25 of the requirements for these permit units.
- Condition 17 from the PTO specified compliance with District Rule 4406 (non-SIP replacement for Kern County Rule 424). This requirement is included as conditions 11 and 12 of the requirements for these permit units.
- Conditions 18 from the PTO required source testing pursuant to District Rule 1081 and is included in conditions 5 through 9 of the requirements for these permit units.
- Conditions 19 through 22 from the PTO specify source test frequency pursuant to District Rule 2520 and are included as conditions 26 through 33 of the requirements for these permit units.
- Conditions 23 and 24 from the PTO provide source testing requirements and source test methods pursuant to District Rule 1081 and are included as conditions 1 and 34, respectively, of the requirements for these permit units.

b. Steam Generator (S-1129-20)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 and 2 from the PTO are included as conditions 12 and 13 of the requirements for this permit unit.
- Condition 3 from the PTO specifies emission limits pursuant to District Rule 4101 and was addressed in Umbrella Permit General Template condition 22.
- Condition 4 from the PTO specifies emission limits pursuant to District Rule 4301 and is included as condition 4 of the requirements for this permit unit.
- Conditions 5, 6 and 7 from the PTO specify proper operational conditions pursuant to the District NSR Rule and are included as conditions 15, 16 and 17 of the requirements for this permit unit.
- Conditions 8, 9 and 10 from the PTO provide monitoring and record keeping requirements pursuant to District Rule 2520 and are included as conditions 18, 19 and 20 of the requirements for this permit unit.
- Conditions 11 through 18 from the PTO specify proper operational conditions pursuant to the District NSR Rule and are included as conditions 21 through 28 of the requirements for this permit unit.
- Condition 19 from the PTO specified compliance with District Rule 4406 (non-SIP replacement for Kern County Rule 424). This requirement is included as conditions 11 and 15 of the requirements for this permit unit.
- Conditions 20 from the PTO required source testing pursuant to District Rule 1081 and is included in conditions 5 through 9 of the requirements for this permit unit.
- Conditions 21 through 24 from the PTO specify source test frequency pursuant to District Rule 2520 and are included as conditions 29 through 36 of the requirements for this permit unit.
- Conditions 25 and 26 from the PTO provide source testing requirements and source test methods pursuant to District Rule 1081 and are included as conditions 1 and 37, respectively, of the requirements for this permit unit.

c. Gas Turbine Engines (S-1129-47, -48, -49)

These units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 through 6 from the PTO specify proper operational conditions pursuant to the District NSR Rule and were included as conditions 21 through 26 of the requirements for these permit units.
- Condition 7 from the PTO provides monitoring requirements pursuant to District Rule 2520 and was included as condition 27 of the requirements for these permit units.
- Conditions 8 through 18 from the PTO specify proper operational conditions pursuant to the District NSR Rule and were included as conditions 28 through 38 of the requirements for these permit units.
- Condition 19 from the PTO provide monitoring, record keeping and reporting requirements pursuant to NSPS requirements and was subsumed by general permit template GT-7-0 conditions.
- Condition 20 from the PTO provides monitoring and record keeping which is more stringent than NSPS and is included as condition 39 of the requirements for these permit units.
- Condition 21 from the PTO specifies operational requirements pursuant to District NSR Rule and was included as condition 40 of the requirements for these permit units.

- Condition 22 from the PTO specifies test methods pursuant to District Rule 2520 and was included in conditions 7 and 41 of the requirements for these permit units.
- Condition 23 from the PTO contained extraneous components relating to liquid-fuel firing. These components were not included in the requirements for these permit units. All other applicable components were included as permit template conditions 11 and 12 of the requirements for these permit units.

d. Gas Turbine Engines (S-1129-53, -55)

These units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO provides VOC control pursuant to District Rule 4401 and was included as condition 21 of the requirements for these permit units.
- Conditions 2 through 17 from the PTO specify proper operational conditions pursuant to the District NSR Rule and were included as conditions 22 through 37 of the requirements for these permit units.
- Condition 18 from the PTO provides monitoring requirements pursuant to District Rule 2520 and was included as condition 38 of the requirements for these permit units.
- Conditions 19 and 20 from the PTO specify proper operational conditions pursuant to the District NSR Rule and were included as conditions 39 and 40 of the requirements for these permit units.
- Condition 21 from the PTO provide monitoring, record keeping and reporting requirements pursuant to NSPS requirements and was subsumed by general permit template GT-7-0 conditions.
- Condition 22 from the PTO provides monitoring and record keeping which is more stringent than NSPS and is included as condition 41 of the requirements for these permit units.
- Condition 23 from the PTO specifies operational requirements pursuant to District NSR Rule and was included as condition 42 of the requirements for these permit units.
- Condition 24 from the PTO specifies test methods pursuant to District Rule 2520 and was included in conditions 7 and 43 of the requirements for these permit units.
- Condition 25 from the PTO contained extraneous components relating to liquid-fuel firing. These components were not included in the requirements for these permit units. All other applicable components were included as permit template conditions 11 and 12 of the requirements for these permit units.

e. Gas Turbine Engine (S-1129-54)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO provides VOC control pursuant to District Rule 4401 and was included as condition 21 of the requirements for this permit unit.
- Conditions 2 through 18 from the PTO specify proper operational conditions pursuant to the District NSR Rule and were included as conditions 22 through 38 of the requirements for this permit unit.
- Condition 19 from the PTO provides monitoring requirements pursuant to District Rule 2520 and was included as condition 39 of the requirements for this permit unit.
- Conditions 20 and 21 from the PTO specify proper operational conditions pursuant to the District NSR Rule and were included as conditions 40 and 41 of the requirements for this permit unit.

- Condition 22 from the PTO provide monitoring, record keeping and reporting requirements pursuant to NSPS requirements and was subsumed by general permit template GT-7-0 conditions.
- Condition 23 from the PTO provide monitoring, record keeping and reporting requirements pursuant to District Rule 2520 and was included as condition 42 of the requirements for this permit unit.
- Condition 24 from the PTO specifies operational requirements pursuant to District NSR Rule and was included as condition 43 of the requirements for this permit unit.
- Condition 25 from the PTO specifies test methods pursuant to District Rule 2520 and was included in conditions 6 and 44 of the requirements for this permit unit.
- Condition 26 from the PTO contained extraneous components relating to liquid-fuel firing. These components were not included in the requirements for this permit unit. All other applicable components were included as permit template conditions 11 and 12 of the requirements for this permit unit.

f. Steam Generator (S-1129-57)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 and 2 from the PTO are included as conditions 12 and 13 of the requirements for this permit unit.
- Condition 3 from the PTO specifies proper operational conditions pursuant to District NSR Rule and is included as condition 14 of the requirements for this permit unit.
- Condition 4 from the PTO specifies emission limits pursuant to District Rule 4101 and was addressed in Umbrella Permit General Template condition 22.
- Condition 5 from the PTO specifies emission limits pursuant to District Rule 4301 and is included as condition 4 of the requirements for this permit unit.
- Conditions 6 through 16 from the PTO specify proper operational conditions pursuant to the District NSR Rule and are included as conditions 15 through 25 of the requirements for this permit unit.
- Condition 17 from the PTO specified compliance with District Rule 4406 (non-SIP replacement for Kern County Rule 424). This requirement is included as conditions 11 and 15 of the requirements for this permit unit.
- Conditions 18 from the PTO required source testing pursuant to District Rule 1081 and is included in conditions 5 through 9 of the requirements for this permit unit.
- Conditions 19 through 22 from the PTO specify source test frequency pursuant to District Rule 2520 and are included as conditions 26 through 33 of the requirements for this permit unit.
- Conditions 25 and 26 from the PTO provide source testing requirements and source test methods pursuant to District Rule 1081 and are included as conditions 1 and 34, respectively, of the requirements for this permit unit.

g. Steam Generators (S-1129-80, -82, -859)

These units have been identified by permit conditions as being dormant units. These units will not be evaluated at this time. Refer to [section IX.B.4](#) (below) for a summary of these units.

h. Process Heaters (S-1129-112, -113, -114, -115, -380, -381)

These permit units were not subject to the District NSR Rule at the time they were installed. The units were each issued an In-house Permit to Operate (In-house PTO) as existing equipment. The units were required to permit when Kern County changed the Rule 202 exemption definition for insignificant equipment.

- i. Tanks (S-1129-179, -210, -211, -212, -220, -221, -223, -225, -227, -229, -230, 240, -244, -247, -252, -253, -254, -268, -270, -271, -272, -273, -274, -275, -276, -277, -278, -279, -280, -281)

These permit units were not subject to the District NSR Rule at the time they were installed. The units were each issued an In-house Permit to Operate (In-house PTO) as existing equipment. The units were required to permit when Kern County changed the Rule 202 exemption definition for insignificant equipment.

- j. Well Vent and Flare (S-1129-385)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO specifies operational requirements pursuant to District NSR Rule and is included as condition 16 of the requirements for this permit unit.
- Condition 2 from the PTO provides requirements based upon District Rule 2520 and is included as condition 17 of the requirements for this permit unit.
- Conditions 3 and 4 from the PTO specify operational requirements pursuant to District NSR Rule and are included as conditions 18 and 19 of the requirements for this permit unit.
- Condition 5 from the PTO provides requirements based upon District Rule 4401 and is included as condition 6 of the requirements for this permit unit.
- Condition 6 from the PTO provides requirements based upon District Rule 4401 and is included as conditions 10 and 11 of the requirements for this permit unit.
- Condition 7 from the PTO provides requirements based upon District Rule 4401 and is included with more detail as conditions 1 through 14 of the requirements for this permit unit.
- Condition 8 from the PTO provides requirements based upon District Rule 4401 and is included as condition 20 of the requirements for this permit unit.
- Conditions 9 through 12 from the PTO specify operational requirements pursuant to District NSR Rule and are included as conditions 21 through 24 of the requirements for this permit unit.
- Conditions 13 and 14 from the PTO provide requirements based upon District Rule 2520 and are included as conditions 25 and 26 of the requirements for this permit unit.
- Condition 15 from the PTO specifies operational requirements pursuant to District NSR Rule and is included as condition 27 of the requirements for this permit unit.
- Condition 16 from the PTO provides requirements based upon District Rule 2520 and is included as condition 28 of the requirements for this permit unit.
- Conditions 17, 18 and 19 from the PTO specify operational requirements pursuant to District Rule 1081 and are included as conditions 29, 30 and 31 of the requirements for this permit unit.

- k. Well Vent (S-1129-386)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 1 and 2 from the PTO specify operational requirements pursuant to District NSR Rule and are included as conditions 15 and 16 of the requirements for this permit unit.
- Condition 3 from the PTO provides requirements based upon District Rule 4401 and is included as condition 11 of the requirements for this permit unit.
- Conditions 4 and 5 from the PTO provide requirements based upon District Rule 4401 and are included with more detail as conditions 1 through 14 of the requirements for this permit unit.
- Condition 6 from the PTO also provides requirements based upon District Rule 4401 and is included as condition 17 of the requirements for this permit unit.
- Conditions 6 through 12 from the PTO specify operational requirements pursuant to District NSR Rule and are included as conditions 17 through 23 of the requirements for this permit unit.

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- Condition 13 from the PTO provides requirements based upon District Rule 2520 and is included as condition 24 of the requirements for this permit unit.
- Conditions 14, 15 and 16 from the PTO specify operational requirements pursuant to District NSR Rule and are included as conditions 25, 26 and 27 of the requirements for this permit unit.

I. Uncontrolled Well Vent (S-1129-409)

This permit unit was not subject to the District NSR Rule at the time it was installed. The unit was issued an In-house Permit to Operate (In-house PTO) as existing equipment. The unit was required to permit when the District changed the District Rule 2020 exemption definition for insignificant equipment.

m. Internal Combustion Engines (S-1129-692, -693, -694, -698, -699, -700)

These units were subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO was included as condition 42 of the facility wide permit. This condition is not federally enforceable because it is based on the public nuisance requirements of the California Health and Safety Code rather than a federally applicable requirement.
- Condition 2 from the PTO specifies emission limits pursuant to District Rule 4101 and was addressed in Umbrella Permit General Template condition 22.
- Condition 3 from the PTO provides emission limits pursuant to District Rule 4801 and was included as condition 1 of the requirements for these permit units.
- Condition 4 from the PTO provides emission limits pursuant to District Rule 4201 and was included as condition 2 of the requirements for these permit units.
- Condition 5 from the PTO requires District Rule 4701 compliance and has been included as condition 9 of the requirements for these permit units.
- Condition 6 from the PTO specifies operational requirements pursuant to District NSR Rule and was included as condition 10 of the requirements for these permit units.
- Condition 7 from the PTO provides monitoring requirements pursuant to District Rules 2520 and 4701 and was included as condition 11 of the requirements for these permit units.
- Condition 8 from the PTO provides record keeping requirements pursuant to District Rule 2520 and was included as condition 8 of the requirements for these permit units.

n. Steam Generator (S-1129-856)

This unit was subject to the District NSR Rule at the time the applicant applied for Authority to Construct. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Condition 1 from the PTO requires District Rule 1081 compliance and has been included as condition 12 of the requirements for this permit unit.
- Conditions 2 and 3 from the PTO specify proper operational conditions and emission limits pursuant to the District NSR Rule and were included as conditions 13 and 14 of the requirements for this permit unit.
- Condition 4 from the PTO specifies record keeping requirements pursuant to District Rule 1070 and has been included as conditions 2 and 3 of the requirements for this permit unit.
- Condition 5 from the PTO specifies sulfur emissions monitoring requirements and has been subsumed by the more detailed requirements of conditions 5 and 6 of the requirements for this permit unit.
- Conditions 6 through 11 from the PTO specify proper operational conditions pursuant to District Rule 4305 and have been included as conditions 3 and 15 through 20 of the requirements for this permit unit.
- Conditions 12 through 15 from the PTO provide source testing requirements pursuant to the District Rule 4305 and were included as conditions 20 through 28 of the requirements for this permit unit.

- Conditions 16 through 19 from the PTO specify procedural requirements pursuant to District Rule 1081 and were included as conditions 29 through 32 of the requirements for this permit unit.

2. District Rule 1081 Source Sampling (Amended December 16, 1993)

District Rule 1081 has been submitted to the EPA to replace Kern County Rule 108.1, which is SIP approved. District Rule 1081 is as stringent as Kern County Rule 108.1, as shown on Table 1.

Table 1 - Comparison of District Rule 1081 and Kern County Rule 108.1

REQUIREMENTS	1081 SJVUAPCD	108.1 KERN
Upon request of the APCO, the source shall provide info. and records to enable the APCO to determine when a representative sample can be taken.	✓	✓
The facility shall collect, have collected or allow the APCO to collect, a source sample	✓	✓
The source shall have District personnel present at a source test	✓	
The applicable test method, if not specified in the rule, shall be conducted in accordance with 40 CFR § 60, Appendix A	✓	
Test procedures: 1) arithmetic mean of three runs 2) a scheduled source test may not be discontinued solely due to the failure to meet the applicable standard(s), and 3) arithmetic mean of two runs is acceptable if circumstances beyond owner or operator control occurs.	✓	

Sections 3.0, 4.0, 5.0, 6.0, and 7.0 of Rule 1081 set forth requirements for sampling facilities, collection of samples, test methods, test procedures, and administrative requirements, respectively.

a. Steam Generators (S-1129-16, -24)

The requirements of this rule are addressed in conditions 1 and 34.

b. Steam Generator (S-1129-20)

The requirements of this rule are addressed in conditions 1 and 37.

c. Process Heaters (S-1129-112, -113, -114, -115, -380, -381)

The requirements of this rule are addressed in condition 1.

d. Well Vent and Flare (S-1129-385)

The requirements of this rule are addressed in conditions 3, 29, 30 and 31.

e. Well Vent (S-1129-386)

The requirements of this rule are addressed in condition 3.

f. Steam Generator (S-1129-856)

The requirements of this rule are addressed in conditions 1, 12 and 29 through 32.

3. District Rule 2080 Conditional Approval

This rule sets forth requirements to comply with all conditions of the Permit to Operate.

a. Process Heaters (S-1129-112, -113, -114, -115, -380, -381)

Conditions 10 and 11 provide operating requirements to assure compliance with air contaminant emission standards.

b. Uncontrolled Well Vent (S-1129-409)

Condition 1 provides operating requirements to assure compliance with air contaminant emission standards.

4. District Rule 2520 Federally Mandated Operating Permits

Section 9.0 of the rule identifies permit content requirements for active permit units. [The following permit units have been identified as “dormant”, or not currently allowed to operate, by conditions on the Permit To Operate: S-1129-80, -82 and -859. Since the units can not legally operate, no further evaluation of the permit content for the above listed units is required at this time. Permit condition 1 for each of these units assures that all Title V requirements will be addressed for each unit prior to operation.](#)

Section 9.1 of the rule requires operational requirements and limitations to assure compliance with all applicable requirements.

Section 9.3.2 of the rule requires that periodic monitoring be performed if none is associated with a given emission limit to assure compliance.

Section 9.4.2 of the rule requires that records of all required monitoring data and support information be retained for a period of at least five years from the date of the monitoring sample, measurement, or report.

a. Facility Wide requirements (S-1129-0)

Conditions 45 and 46 require inspection of tank vapor recovery systems and tank vent valves to assure proper operation of control equipment.

b. Steam Generators (S-1129-16, -24)

- Periodic monitoring consisting of testing and sampling is supported by conditions 2, and 5 through 11.
- Condition 3 will assure that all records be maintained for at least five years.
- Sulfur compound emission limits of District Rule 4406 are addressed in condition 11.
- Emission monitoring, reporting and record keeping is included as conditions 15, 16 and 17.
- Source testing for NO_x and CO emissions is required by conditions 26 through 33, and 35.

c. Steam Generator (S-1129-20)

- Periodic monitoring consisting of testing and sampling is supported by conditions 2, and 5 through 11.
- Condition 3 will assure that all records be maintained for at least five years.
- Sulfur compound emission limits of District Rule 4406 are addressed in condition 11.
- Emission monitoring, reporting and record keeping is included as conditions 18, 19 and 20.

- Source testing for NO_x and CO emissions is required by conditions 26 through 33, and 35.

d. Gas Turbine Engines (S-1129-47, -48, -49)

- Condition 27 provides federal emission limits, which are applicable during periods of startup and shutdown.
- Corrective action for visible emissions exceedances was added to permit condition 38.
- Record keeping requirements are addressed in permit condition 39.
- Test methods supporting District Rule 4703 are addressed in permit condition 41.

e. Gas Turbine Engines (S-1129-53, -55)

- Condition 39 provides federal emission limits, which are applicable during periods of startup and shutdown.
- Corrective action for visible emissions exceedances was added to permit condition 40.
- Record keeping requirements are addressed in permit condition 41.
- Test methods supporting District Rule 4703 are addressed in permit condition 43.

f. Gas Turbine Engine (S-1129-54)

- Condition 39 provides federal emission limits, which are applicable during periods of startup and shutdown.
- Corrective action for visible emissions exceedances was added to permit condition 41.
- Record keeping requirements are addressed in permit condition 42.
- Test methods supporting District Rule 4703 are addressed in permit condition 43.

g. Steam Generator (S-1129-57)

- Periodic monitoring consisting of testing and sampling is supported by conditions 2, and 5 through 11.
- Condition 3 will assure that all records be maintained for at least five years.
- Sulfur compound emission limits of District Rule 4406 are addressed in condition 11.
- Source testing for NO_x and CO emissions is required by conditions 26 through 33, and 35.

h. Process Heaters (S-1129-112, -114, -115, -380, -381)

- Periodic monitoring consisting of testing and sampling is supported by conditions 2, and 5 through 9.
- Condition 3 will assure that all records be maintained for at least five years.
- Record keeping to ensure compliance with Rule 4305 exemption levels has been included as condition 12.

i. Process Heater (S-1129-113)

- Periodic monitoring consisting of testing and sampling is supported by conditions 2, and 5 through 9.
- Condition 3 will assure that all records be maintained for at least five years.

j. Tanks (S-1129-179, -210, -211, -220, -221, -223, -225, -227, -229, -244, -247, -252, -253, -254, -268, -271, -272, -273, -275, -277, -278, -279, -280)

- Record keeping requirements supporting District Rule 4623 are addressed in permit condition 3.
- Periodic monitoring consisting of testing is supported by conditions 2 and 4.

- k. Tanks (S-1129-212, -230, -270, -274, -276, -281)
 - Record keeping requirements supporting District Rule 4623 are addressed in permit condition 2.
 - Periodic monitoring consisting of testing is supported by conditions 1 and 3.
- l. Well Vent and Flare (S-1129-385)
 - Condition 5 will assure that all records be maintained for at least five years.
 - Periodic monitoring consisting of testing and sampling is supported by conditions 14, 15, 17, 18, 25, 26, 28, 32 and 33.
- m. Well Vent (S-1129-386)
 - Condition 5 will assure that all records be maintained for at least five years.
 - Periodic monitoring consisting of testing and sampling is supported by condition 14.
 - Periodic monitoring consisting of record keeping is supported by conditions 24 and 26.
- n. Internal Combustion Engines (S-1129-692, -693, -694, -698, -699, -700)
 - Monitoring, testing and reporting to assure compliance with District and Federal requirements are addressed in permit conditions 4 through 7, and 11.
 - Condition 8 will assure that all records be maintained for at least five years.
- o. Steam Generator (S-1129-856)
 - Periodic monitoring consisting of testing and sampling is supported by conditions 2, and 5 through 12.
 - Condition 3 will assure that all records be maintained for at least five years.
 - Flue gas recirculation monitoring, reporting and record keeping is included as conditions 14 through 19.
 - Source testing for NO_x and CO emissions is required by conditions 22 through 28.
 - Source test methods and procedures are specified in conditions 29 through 33.
- 5. District Rule 4201 Particulate Matter Concentration (Amended December 17, 1992) (Non SIP replacement for Kern County Rule 404)

EPA issued a relative stringency finding, dated August 20, 1996, stating District Rule 4201 is more stringent than SIP approved Kern County Rule 404.

Section 3.1 requires emissions to be at or below 0.1 grain of particulate matter per dry standard cubic foot of exhaust gas.

Natural Gas Internal Combustion:

The expected concentration of PM emitted from a natural gas fired IC engine is shown by the following analysis:

$$\left[\frac{0.0007(\text{lbPM})}{10^6(\text{Btu})} \right] \times \left[\frac{7000(\text{grains})}{(\text{lb})} \right] \times \left[\frac{10^6(\text{Btu})}{8710(\text{dscf})} \right] = 0.00056 \frac{\text{grain}}{\text{dscf}}$$

$$\text{where } \frac{0.0007 \# PM}{10^6 Btu} = \text{Emission Factor (AP-42 Table 3.2-3)}$$

$$\frac{10^6 (Btu)}{8710 (dscf)} = \text{F Factor (40 CFR Appendix A Table 19-1)}$$

The preceding analysis demonstrates that natural gas fired IC engines will be in compliance with the PM limits of this rule. Compliance with District Rule 4201 is assured for all units that are natural gas fired. Therefore, no testing or monitoring will be required for these units.

Natural Gas External Combustion:

The expected concentration of PM emitted from a natural gas fired steam generator is shown by the following analysis:

$$\left(\frac{13.7 \text{ lb PM}}{10^6 \text{ cf}} \right) \left(\frac{1 \text{ scf}}{900 \text{ Btu}} \right) \left(\frac{100 \text{ MMBtu}}{\text{hr}} \right) = \left(\frac{1.52 \text{ lb PM}}{\text{hr}} \right) < \left(\frac{10 \text{ lb PM}}{\text{hr}} \right)$$

$$\left(\frac{13.7 \text{ lb PM}}{10^6 \text{ ft}^3} \right) \left(\frac{1 \text{ scf}}{900 \text{ Btu}} \right) \left(\frac{1 \text{ MMBtu}}{8710 \text{ dscf}} \right) \left(\frac{7000 \text{ grain}}{1 \text{ lb}} \right) = \left(\frac{0.01 \text{ grain}}{\text{dscf}} \right) < \left(\frac{0.1 \text{ grain}}{\text{dscf}} \right)$$

where:

$13.7 \frac{\text{lb PM}}{10^6 \text{ cf}}$ = sum of filterable and condensable uncontrolled emission factors for natural gas-fired boilers (AP42, Table 1.4-2)

$\frac{900 \text{ Btu}}{1 \text{ scf}}$ = the minimum expected higher heating value of natural gas (AP42, Table 1.4.1)

$\frac{100 \text{ MMBtu}}{\text{hr}}$ = maximum heat input this template

$\frac{8710 \text{ dscf}}{1 \text{ MMBtu}}$ = F factor, Fd, for natural gas at 0% O₂ (40CFR60, App. A, Table 19-1)

$\frac{10,610 \text{ wscf}}{1 \text{ MMBtu}}$ = F factor, Fw, for natural gas at 0% O₂ (40CFR60, App. A, Table 19-1)

$\frac{7000 \text{ grain}}{1 \text{ lb}}$ = conversion factor (AP42, Appendix A)

The only constituents found in non-regulated gas streams that contribute to the formation of PM are sulfur and, occasionally, trace amounts of metals. Any metals present in the gas stream are removed during the free water knockout stage in the condenser at the compressor. The results of source tests on units operating on combined waste gas and natural gas show PM levels far below allowable levels (actual source tests are on file with the District). Based on these source test results and the preceding compliance analysis, compliance with applicable PM limits is assured without the need for PM testing.

Diesel Fuel Internal Combustion:

Results from source tests of diesel-fired internal combustion (IC) engines generally indicate emission rates from these units are less than the allowable limit of 0.1 grain/dscf. Of the tests available at the time of this writing, most were in the range of 0.042 to 0.061 grain/dscf, with a low of 0.020 grain/dscf, and a high of 0.092 grain/dscf. However, although the above testing is sufficient to assume that IC engines using this template comply with the 0.1 grain/dscf limit, the data is insufficient to prove compliance in all cases. Therefore, periodic monitoring will be required in the form of source testing, unless the engine is an emergency or backup IC engine operating less than 200 hours per year. If the initial test results for PM emissions are measured to be less than 0.06 grain/dscf, testing will be required at least once every 5 years. Otherwise, testing shall occur not less than once every 24 months. Test results from an engine that represents a group of engines in terms of rated brake horsepower, engine make and series, operational conditions, fuel used, and control method, shall satisfy this condition provided this group of engines is owned and operated by a single owner/operator.

a. Steam Generators (S-1129-16, -20, -24, -57, -856)

Compliance is assured by condition 4.

b. Process Heaters (S-1129-112, -113, -114, -115, -380, -381)

Compliance is assured by condition 4.

c. Internal Combustion Engines (S-1129-692, -693, -694, -698, -699, -700)

Compliance is assured by conditions 2 and 6.

6. District Rule 4301 Fuel Burning Equipment (Amended December 17, 1992)

Section 5.1 requires PM emissions to be limited to 0.1 grain per cubic foot of gas calculated to 12% carbon dioxide at dry standard conditions.

Since maximum particulate emissions occur at 0% excess air, which may occur at operating CO₂ levels and dry standard conditions, the Rule limit is included as a condition.

Section 5.2.1 limits emissions to 200 lb/hr of sulfur compounds, calculated as SO₂.

Section 5.2.2 limits the emission of NO_x to 140 lb/hr (calculated as NO₂). The following analysis demonstrates that compliance is expected:

$$\left(\frac{140 \frac{lb \cdot NO_x}{10^6 \cdot ft^3}}{0.00105 \frac{MMBtu}{ft^3}} \right) \left(100 \frac{MMBtu}{hr} \right) = 13.3 \frac{lb \cdot NO_x}{hr}$$

where:

$$140 \frac{lb \cdot NO_x}{10^6 \cdot ft^3} = \text{uncontrolled NO}_x \text{ emission factor for gas fired boilers (AP42, Table 1.4-2)}$$

$$0.00105 \frac{MMBtu}{ft^3} = 1050 \frac{Btu}{ft^3} = \text{natural gas heating value (AP42, Table 1.4-2)}$$

The preceding calculation clearly demonstrates that NO_x emissions, for even the largest units at this facility, are well below the limit of 140 lb/hr from District Rule 4301. When firing on gaseous fuels, NO_x emissions are approximately 1/10 or less of that allowed by Rule 4301. For gaseous-fueled units, compliance is assured without testing, record keeping and monitoring requirements.

Section 5.2.3 limits PM emissions to 10 lb/hr.

An excess air concentration of 0% in the exhaust results in the maximum particulate matter concentration for any given emission rate. Therefore, the following calculations use an uncorrected F factor to represent worst-case emissions.

GASEOUS FUEL FIRED UNITS

The following calculations, using AP42 emission factors for natural gas, demonstrate that the emission of PM during the firing of gaseous fuels complies with the limits of these rules.

$$\left(\frac{13.7 \text{ lb PM}}{10^6 \text{ cf}} \right) \left(\frac{1 \text{ scf}}{900 \text{ Btu}} \right) \left(\frac{100 \text{ MMBtu}}{\text{hr}} \right) = \left(\frac{1.52 \text{ lb PM}}{\text{hr}} \right) < \left(\frac{10 \text{ lb PM}}{\text{hr}} \right)$$

$$\left(\frac{13.7 \text{ lb PM}}{10^6 \text{ ft}^3} \right) \left(\frac{1 \text{ scf}}{900 \text{ Btu}} \right) \left(\frac{1 \text{ MMBtu}}{8710 \text{ dscf}} \right) \left(\frac{7000 \text{ grain}}{1 \text{ lb}} \right) = \left(\frac{0.01 \text{ grain}}{\text{dscf}} \right) < \left(\frac{0.1 \text{ grain}}{\text{dscf}} \right)$$

where:

$13.7 \frac{\text{lb PM}}{10^6 \text{ cf}}$ = sum of filterable and condensable uncontrolled emission factors for natural gas-fired boilers (AP42, Table 1.4-2)

$\frac{900 \text{ Btu}}{1 \text{ scf}}$ = the minimum expected higher heating value of natural gas (AP42, Table 1.4.1)

$\frac{100 \text{ MMBtu}}{\text{hr}}$ = maximum expected heat input

$\frac{8710 \text{ dscf}}{1 \text{ MMBtu}}$ = F factor, F_d, for natural gas at 0% O₂ (40CFR60, App. A, Table 19-1)

$\frac{10,610 \text{ wscf}}{1 \text{ MMBtu}}$ = F factor, F_w, for natural gas at 0% O₂ (40CFR60, App. A, Table 19-1)

$\frac{7000 \text{ grain}}{1 \text{ lb}}$ = conversion factor (AP42, Appendix A)

The only constituents found in non-regulated gas streams that contribute to the formation of PM are sulfur and, occasionally, trace amounts of metals. Any metals present in the gas stream are removed during the free water knock-out stage in the condenser at the compressor. The results of source tests on units operating on combined waste gas and natural gas show PM levels far below allowable levels (actual source tests are on file with the District). Based on these source test results and the preceding compliance analysis, compliance with applicable PM limits is assured without the need for PM testing.

RESIDUAL OIL FIRED (INCLUDING CRUDE OR TOPPED CRUDE)

Compliance with PM limits will be assured by permit conditions that require source testing when firing on residual oil (including crude or topped-crude). The operator is required to record daily amount of all fuels combusted, the dates on which firing on any fuel other than certified gaseous or diesel fuel has occurred by permit condition, as well as the type of non-certified fuel fired. If a unit is fired on residual oil at any time during a calendar year, the operator is required by permit condition to show compliance with the PM emission limits by source testing the unit during such firing and within 60 days of said firing.

a. Steam Generators (S-1129-16, -24)

- Compliance with sections 5.1 and 5.2.3 is assured by condition 4.
- Compliance with section 5.2.1 is assured by conditions 5 through 12.
- Compliance with section 5.2.2 is assured without testing, record keeping and monitoring requirements.

b. Steam Generators (S-1129-20, -57)

- Compliance with sections 5.1 and 5.2.3 is assured by condition 4.
- Compliance with section 5.2.1 is assured by conditions 5 through 11 and 15.
- Compliance with section 5.2.2 is assured without testing, record keeping and monitoring requirements.

c. Process Heaters (S-1129-112, -113, -114, -115, -380, -381)

- Compliance with sections 5.1 and 5.2.3 is assured by condition 4.
- Compliance with section 5.2.1 is assured by conditions 5 through 9.
- Compliance with section 5.2.2 is assured without testing, record keeping and monitoring requirements.

d. Steam Generator (S-1129-856)

- Compliance with sections 5.1 and 5.2.3 is assured by condition 4.
- Compliance with section 5.2.1 is assured by conditions 5 through 11.
- Compliance with section 5.2.2 is assured without testing, record keeping and monitoring requirements.

7. District Rule 4401 Steam-Enhanced Crude Oil Production Well Vents

District Rule 4401 (amended January 15, 1998) is a renumbering of the requirements of SIP approved District Rule 465.1.

Section 4.1 allows VOC emission exemption of the well vent during service or repair only when the well is not producing.

Section 4.5.1 requires any exempt well to be located more than 1000 feet from an existing well vent vapor control system operated by the company.

Section 4.7.3 does not allow exemption to continue due to any modification to increase the emissions or to increase the potential to emit.

Section 5.0 sets forth requirements for limiting the emissions of Volatile Organic Compounds (VOCs). This section lists emission control requirements as well as work practice standards.

Section 6.0 sets forth requirements for testing and record keeping. This section also allows the APCO to waive certain control systems from the requirements of section 6.2.1.

This waiver applies to control systems consisting of fuel burning equipment or smokeless flares, and systems which do not have VOC emissions (specifically, if VOC collected is re-injected underground). The basis of the waiver for smokeless open flares is that technology does not currently exist for source testing these controls. However, typically these devices have 99% or greater control efficiency. The basis of the waiver for control systems which re-inject VOCs underground is that these systems are assumed to have 100% control. This VOC disposal method does not use an emission destruction device and there is no need to conduct a source test. The basis of the waiver for control systems consisting of fuel burning equipment (primarily steam generators) is that these units have greater than 99% control efficiency for VOC, as demonstrated by the following calculations:

STEAM GENERATORS, > 100 MMBtu/hr:

$$\left(\frac{1.4 \frac{lb \cdot VOC}{10^6 \cdot cf}}{\frac{1 \cdot lb}{23.8cf}} \right) = 0.000033 \frac{lb \cdot VOC}{lb \cdot gas} = 0.0033\%$$

STEAM GENERATORS, < 100 MMBtu/hr:

$$\left(\frac{2.8 \frac{lb \cdot VOC}{10^6 \cdot cf}}{\frac{1 \cdot lb}{23.8cf}} \right) = 0.000067 \frac{lb \cdot VOC}{lb \cdot gas} = 0.0067\%$$

where:

$$1.4 \frac{lb \cdot VOC}{10^6 \cdot cf} = \text{TOC emission factor (excluding methane), natural gas fired boilers >100 MMBtu/hr}$$

(AP-42, Table 1.4-3)

$$2.8 \frac{lb \cdot VOC}{10^6 \cdot cf} = \text{TOC emission factor (excluding methane), natural gas fired boilers <100 MMBtu/hr}$$

(AP-42, Table 1.4-3)

$$\frac{1 \cdot lb}{23.8cf} = \text{density of natural gas, (AP-42, Appendix A)}$$

The preceding calculations demonstrate that the control efficiency for VOC emissions is greater than 99% by two orders of magnitude for steam generators. Therefore, source tests for VOC control effectiveness are clearly unnecessary.

Section 6.2.1 requires annual source testing to show control efficiency compliance.

Control systems which have been waived from the source test requirements of section 6.2.1 are still required to demonstrate compliance with sections 5.1 and 5.2 of the rule for 99% control of collection and control efficiency. There are no general conditions addressing compliance with these sections for such equipment. Consequently, a one-time demonstration of collection efficiency using a mass balance and source specific data will be necessary for such sources. In the Title V application (except by the use of templates) the source must also demonstrate compliance with the requirement that collection and control system have 99% control efficiency.

a. Gas Turbine Engines (S-1129-53, -54, -55)

Section 5.0 is addressed in condition 23.

b. Well Vent and Flare (S-1129-385)

- Section 4.1 is addressed in condition 2.
- Section 5.0 is addressed in conditions 6 through 11 and 20.
- Section 6.0 is addressed in conditions 4, 12 and 13.

c. Well Vent (S-1129-386)

- Section 4.1 is addressed in condition 2.
- Section 5.0 is addressed in conditions 6 through 11 and 18.
- Section 6.0 is addressed in conditions 4, 12, 13, 17 and 22.

d. Uncontrolled Well Vent (S-1129-409)

- Section 4.5.1 is addressed in condition 2.
- Section 4.7.3 is addressed in condition 3.

8. District Rule 4407 In-Situ Combustion Well Vents (Adopted May 19, 1994)

Section 2.0 states that this rule is applicable to all crude oil production wells where production has been enhanced by in-situ combustion.

a. Well Vent and Flare (S-1129-385)

Section 2.0 exempts this unit from the requirements of this rule by condition 1.

b. Well Vent (S-1129-386)

Section 2.0 exempts this unit from the requirements of this rule by condition 1.

9. District Rule 4622 Transfer of Gasoline into Vehicle Fuel Tanks

Section 6.2.2 requires notification 15 days prior to each source test.

10. District Rule 4623 Storage of Organic Liquids

District Rule 4623 has been submitted to the EPA to replace the old, SIP approved, District Rule 463.2. Attachment D lists all of the applicable requirements of District Rule 4623 and shows which are included in the rule from the old, SIP approved, rule. This table shows that District Rule 4623 is as stringent as rule 463.2, thus rule 463.2 will be subsumed by rule 4623.

Section 2.0 states that this rule is only applicable to equipment used to store organic liquids, including crude oil and petroleum distillates, with a true vapor pressure of greater than 1.5 psia.

This rule requires that all tanks with a storage capacity greater than 19,800 gallons, storing organic liquids with a true vapor pressure greater than or equal to 1.5 psia, have either a floating roof or vapor recovery system to control volatile organic compound (VOC) emissions.

Section 3.7 defines the term "organic liquid" as "any liquid which contains VOCs and has a True Vapor Pressure (TVP) greater than 1.5 psia at actual storage conditions."

- a. Tanks (S-1129-179, -210, -211, -220, -221, -223, -225, -227, -229, -244, -247, -252, -253, -254, -268, -271, -272, -273, -275, -277, -278, -279, -280)

Section 3.7 exempts these units from the requirements of this rule by condition 1.

- b. Tanks (S-1129-212, -230, -270, -274, -276, -281)

Currently, there are no applicable requirements of Rule 4623 for tanks less than 471-barrel capacity. However, the Rule is still applicable unless specifically exempted by Section 4.0. Small tanks (less than 471 barrel capacity) are not affected by the requirements of Rule 4623; however, record of TVP of liquids stored in these tanks will be required.

11. District Rule 4801 Sulfur Compounds

Refer to the streamlining demonstration in [section IX.C.1](#) (below) for reference to this requirement.

12. Kern County Rule 407 Sulfur Compound Emissions

Refer to the streamlining demonstration in [section IX.C.1](#) (below) for reference to this requirement.

13. Kern County Rule 424 Sulfur Compounds From Oil Field Steam Generator

Kern County Rule 424 limits sulfur emissions to 0.11lb sulfur per million BTUs of heat input. Section D of this rule states the operator may satisfy this emission limit by demonstrating the total emissions of sulfur compounds from all of steam generators located at the stationary source with an ATC or PTO issued prior to September 12, 1979, do not exceed the total emissions of sulfur compounds from these generators which would result if all such units were operating in compliance with this emission limit. For PUC regulated natural gas the maximum sulfur content is 0.0068 lb sulfur per million BTU (assuming a higher heating value of 0.00105 MMBtu per standard cubic foot). For FERC regulated gas, the maximum sulfur content is even lower (0.00102 lb sulfur per million BTU). Therefore compliance is expected for these fuels.

In order to demonstrate compliance with this requirement for other fuels, the operator must determine the sulfur emissions and heat input from fuel certification, fuel testing, or source testing in combination with routine fuel analysis.

- a. Steam Generators (S-1129-16, -20, -24, -57, -856)

- Compliance with this rule is assured by condition 7, 8 and 11.

14. 40 CFR Part 60 Subpart A

Section 60.18 (c)(1) requires flares to be designed and to operate with no visible emissions, except for periods not to exceed 5 minutes during any 2 consecutive hours. Section 60.18 (f)(1) also requires that visible emissions determinations be made using EPA Method 22.

Sections 60.18 (c)(3), 60.18 (c)(4)(i-iii), 60.18 (c)(5) and 60.18 (f)(3-6) set a limit on the net heating value of the flared gas to be no less than 200 Btu/scf for nonassisted flares and 300 Btu/scf for air-assisted or steam-assisted flares. The method to be used to calculate net heating value is specified.

Section (c)(4)(i-iii) requires the flare gas exit velocity to conform to the following limits:

<u>Flare Type</u>	<u>Flare Gas Min. Btu/scf</u>	<u>Exit Velocity (ft/sec)</u>	
		<u>Min</u>	<u>Max</u>
Air-assisted	300	----	< 55

Nonassisted	200	----	< 60
Steam-assisted	300	----	< 60
Nonassisted	>1,000	60	<400
Steam-assisted	>1,000	60	<400

Sections 60.18 (c)(2), 60.18 (e), and 60.18 (f)(2) require that flares be operated with a flame present at all times when emissions may be vented to them. The presence of the pilot flame shall be monitored using a thermocouple or any other equivalent device to detect the flame presence.

a. Well Vent and Flare (S-1129-385)

This unit is not subject to the requirements of 40 CFR 60, therefore section 60.18 is not applicable.

15. 40 CFR 60, Subpart K Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978

a. Tanks (S-1129-179, -210, -211, -212, -220, -221, -223, -225, -227, -229, -230, -244, -247, -252, -253, -254, -268, -270, -271, -272, -273, -274, -275, -276, -277, -278, -279, -280, -281)

The requirements of 40 CFR 60, Subpart K do not apply to storage vessels for petroleum or condensate stored, processed, and/or treated at a drilling and production facility prior to custody transfer. These units are exempt from this requirement.

16. 40 CFR 60, Subpart Ka Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984

a. Tanks (S-1129-179, -210, -211, -212, -221, -227, -229, -230, -244, -247, -252, -253, -254, -268, -270, -271, -272, -273, -274, -275, -276, -277, -278, -279, -280, -281)

The requirements of 40 CFR 60, Subpart Ka do not apply to storage vessels for petroleum or condensate stored, processed, and/or treated at a drilling and production facility prior to custody transfer which store less than 420,000 gallons. These units are exempt from this requirement.

b. Tanks (S-1129-220, -223, -225)

The requirements of 40 CFR 60, Subpart Ka do not apply to storage vessels for petroleum liquids which commenced construction before May 18, 1978 or after July 23, 1984. These units were constructed prior to May 18, 1978; therefore, this requirement does not apply.

17. 40 CFR 60, Subpart Kb Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984

a. Tanks (S-1129-179, -210, -211, -212, -220, -221, -223, -225, -227, -229, -230, -244, -247, -252, -253, -254, -268, -270, -271, -272, -273, -274, -275, -276, -277, -278, -279, -280, -281)

The requirements of 40 CFR 60, Subpart Kb do not apply to storage vessels for petroleum or condensate stored, processed, and/or treated at a drilling and production facility prior to custody transfer which store 420,000 gallons or less. These units are exempt from this requirement.

18. 40 CFR Part 60 Subpart GG Standards of Performance for Stationary Gas Turbines

Section 60.332(c) provides maximum federal NO_x emission limits.

Section 60.333(a) provides maximum federal SO_x emission limits.

a. Gas Turbine Engines (S-1129-47, -48, -49)

Sections 60.332(c) and 60.333(a) are addressed in condition 29.

b. Gas Turbine Engines (S-1129-53, -55)

Sections 60.332(c) and 60.333(a) are addressed in condition 39.

c. Gas Turbine Engine (S-1129-54)

Sections 60.332(c) and 60.333(a) are addressed in condition 40.

19. 40 CFR 63, Subpart HH National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities

The facility is identified as a heavy oil source. The facility has performed the required API test for determination. The requirements of 40 CFR 63, Subpart HH do not apply to this facility.

20. 40 CFR 68, Chemical Accident Prevention Provisions

Requirements from this regulation are applicable to facilities, which may store regulated substances above a threshold limit, as specified in the regulation. Chevron U.S.A., Inc., Heavy Oil Western, stores crude oil, and is therefore subject to these requirements. Compliance with these regulations will be required by condition 42 of the facility-wide requirements (S-1129-0).

C. Streamlining Applicable Requirements

1. District Rule 4801, and Kern County Rule 407

These rules contain limits on emissions of sulfur compound. The following analysis shows that the proposed sulfur emission limits are as stringent as District Rule 4801, and more stringent than Kern County Rule 407. Streamlining procedures, as documented in the following steps, are used to substitute the proposed set of requirements for the otherwise applicable requirements.

Step 1. Side-by-side Comparison of Applicable Requirements:

CITATION:	District Rule 4801, 3.1	Kern County Rule 407	Proposed Requirements
WORK PRACTICE STANDARDS:	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> Firing the unit on PUC or FERC regulated natural gas or on natural gas with sulfur content less than 3.3% or on fuel oil with sulfur content not exceeding 3.0% by weight.
EMISSION LIMIT:	<ul style="list-style-type: none"> Two-tenth (0.2) percent by volume calculated as sulfur dioxide (SO_x), on a dry basis averaged over 15 consecutive minutes. [Rule 4801] 	<ul style="list-style-type: none"> Two-tenth (0.2) percent by volume calculated as sulfur dioxide (SO_x) at standard condition. [Kern County Rule 407] 	<ul style="list-style-type: none"> Sulfur compound emissions shall not exceed 2000 ppmv (0.2% by volume), calculated as SO₂, on a dry standard basis over 15 consecutive minutes. [District Rule 4801, 3.1]
MONITORING:	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> Maintain copies of fuel invoices and certification from supplier when fire the unit on PUC natural gas. [2520, 9.4.2] Fuel sulfur content testing for 8 consecutive weeks, then semi-annually. [2520, 9.4.2]
RECORD KEEPING:	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> record daily amount of all fuels combusted, the dates on which firing on any fuel other than certified gaseous or diesel fuel has occurred, as well as the type of non-certified fuel fired [2520, 9.4.2]
REPORTING:	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> None

TEST METHODS:	<ul style="list-style-type: none"> EPA Method 8 ARB Method 1-100 	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> EPA Method 8 and CARB Method 1-100 Fuel hhv using ASTM D 240 or D2382 for fuel oil and ASTM D 1826 or D 1945 with ASTM D 3588 Fuel sulfur content using ASTM D 2880 when fire on fuel oil
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Step 2. Select most stringent emission limit or performance standard

The proposed sulfur compounds emission of 2000 ppmv (0.2% by volume) calculated as sulfur dioxide (SO₂), over 15 consecutive minutes is at least as stringent as those imposed by District Rule 4801 and more stringent than Kern County Rule 407 as demonstrated:

Compliance with sulfur Limit – District Rule 4801, 3.1:

This rule requires sulfur emissions to be limited to the following:

Two-tenth (0.2) percent by volume of sulfur compounds at standard condition, calculated as sulfur dioxide, on a dry basis over 15 consecutive minutes

The proposed conditions include these requirements and are therefore at least as stringent as District Rule 4801.

Compliance with Sulfur limit – Kern County Rule 407:

This rule requires sulfur emissions to be limited to the following:

Two-tenth (0.2) percent of sulfur emission at standard condition over 15 consecutive minutes

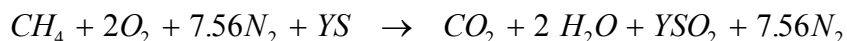
This old county rule does not specify dry conditions, so wet conditions are appropriately assumed. The proposed requirement of is more stringent than the requirements from the county rule referenced above, since the total wet exhaust volume from any unit is always greater than the dry exhaust volume, while the total sulfur emission is constant. This is verified by comparing the F factors in 40 CFR 60, Appendix A, Table 19.1. F_w (wet) is always greater than F_d (dry) for any fuel, and when F_w is substituted for F_d in the compliance calculations below in Step 3, it will always yield a lower PM emissions value than F_d. Therefore the proposed conditions are more stringent than the county rule.

Step 3. Conditions ensuring compliance with applicable requirements:

An excess air concentration of 0% in the exhaust results in the maximum particulate matter concentration for any given emission rate. Therefore, the following calculations use an uncorrected F factor to represent worst-case emissions. Calculations determining the excess air concentrations for 12% CO₂ are shown in [Attachment D](#).

Natural Gas Fired:

Assuming that 0% excess air in the exhaust stream corresponds with maximum SO_x emissions concentration (neglecting NO_x and SO_x relative to SO₂ in the exhaust) and that CH₄ represents a typical gaseous fuel, the combustion equation is:



Where: Y = moles of sulfur in the fuel.

Solving an expression for the fraction of SO₂ in the dry exhaust by volume gives:

$$\frac{Y}{1 + 7.56} = 0.002 \Rightarrow Y = 0.01712$$

Where: Y = mole fraction of S per mole of CH₄ combusted

1 = one mole of CO₂

7.56 = number of moles of N₂

0.002 = 0.2% by volume = 2000 ppmv limit per County Rule 407

Use Y to calculate the weight fraction of S in one mole of CH₄:

$$\frac{(0.01712)(32.06)}{(16.04) + (0.01712)(32.06)} = 0.033 \Rightarrow 3.3\% \text{ S by weight in the fuel.}$$

where:

32.06 = molecular weight of sulfur (S)

16.04 = molecular weight of methane (CH₄)

0.033 = fraction of S by weight in the fuel

The preceding calculation shows that an exhaust concentration of 0.2% by volume corresponds to a gaseous fuel sulfur content by weight of 3.3%. Typically, natural gas contains much less sulfur than 3.3% by weight and shall comply with this limit. The permittee shall keep the records of fuel invoices and supplier certifications when firing on PUC-regulated gas.

Fuel analysis to determine fuel sulfur content is required when firing the unit on noncertified natural gas to ensure an ongoing compliance.

Using Fuel Oil (included Crude-oil)

$$\frac{\left(\frac{157(S) \text{ lb } SO_x}{10^3 \text{ gal oil}} \right) \left(\frac{23.7 \text{ L } SO_2}{\text{gmol } SO_2} \right) \left(\frac{0.035315 \text{ dscf } SO_2}{\text{L } SO_2} \right) \left(\frac{453.59 \text{ g } SO_2}{\text{lb } SO_2} \right)}{\left(\frac{9190 \text{ dscf exhaust}}{\text{MMBtu}} \right) \left(\frac{64.14 \text{ g } SO_2}{\text{gmol } SO_2} \right) \left(\frac{150 \text{ MMBtu}}{10^3 \text{ gal oil}} \right)} = \left(\frac{0.002 \text{ dscf } SO_2}{\text{dscf exhaust}} \right)$$

where:

S ≡ Weight % of sulfur in the oil

$$\frac{157(S) \text{ lb } SO_2}{10^3 \text{ gal}} = \text{Uncontrolled emission factor for } SO_2 \text{ (AP-42, Table 1.3-2)}$$

$$23.7 \frac{\text{L}}{\text{gmol}} = \frac{(288.71 \text{ K}) \left(22.4 \frac{\text{L}}{\text{gmol}} \right)}{273.15 \text{ K}} = \text{Molar volume of an ideal gas corrected to District standard conditions (60° F, 14.7 psi) per Charles' Law}$$

$$0.035315 \frac{\text{ft}^3}{\text{L}} = \text{Conversion factor (AP42, Appendix A)}$$

$$453.59 \frac{\text{g}}{\text{lb}} = \text{Conversion factor (AP42, Appendix A)}$$

$$9190 \frac{\text{dscf}}{\text{MMBtu}} = \text{F-factor, } F_d, \text{ for oil (40 CFR § 60, App. A, Meth. 19, Table 19-1)}$$

$$64.14 \frac{g \cdot SO_2}{gmol} = \text{Molecular weight, } SO_2$$

$$\frac{150,000 \text{ } Btu}{1 \text{ gal diesel}} = \text{Heating value of residual oil (AP-42, Appendix A)}$$

$$0.002 \frac{parts \cdot SO_2}{parts \cdot exhaust} = \text{District Rules 4801 emission limit}$$

The preceding calculation shows that an exhaust concentration of 0.2% by volume corresponds to a fuel sulfur content by weight of 3.0%. If applicable, units fired on fuel oil with sulfur content less than 1.3% shall comply with the sulfur emissions limit. Periodic testing, monitoring, and record keeping shall be required to demonstrate an on going compliance when firing on fuel oil. Fuel sulfur content testing shall be performed weekly except that if compliance has been demonstrated for eight consecutive weeks, then the testing frequency shall be semi-annual. In all cases, operator shall record dates that the unit is fired on non-certified fuel.

Step 4. Permit shield

By adding conditions developed from this streamlining the applicant is granted a permit shield from Kern County SIP rule 407 and from the requirements of District Rule 4801. See section X, Permit Shields.

a. Well Vent and Flare (S-1129-385)

Compliance is assured by permit conditions 22, 32 and 33.

b. Internal Combustion Engines (S-1129-692, -693, -694, -698, -699, -700)

Compliance is assured by permit conditions 1, 3, 4 and 5.

X. PERMIT SHIELD

A permit shield legally protects a facility from enforcement of the shielded regulations when a source is in compliance with the terms and conditions of the Title V permit. Compliance with the terms and conditions of the Operating Permit is considered compliance with all applicable requirements upon which those conditions are based, including those that have been subsumed.

A. Requirements Addressed by Model General Permit Templates

By using the model general permit template(s) listed in Section IV of this evaluation, the applicant has requested that a permit shield be issued for requirements addressed in the template(s). The basis for each permit shield is discussed in the Permit Shield section of each template.

B. Requirements not Addressed by Model General Permit Templates

The applicant is requesting a permit shield for each of the requirements listed below:

1. District Rule 4801 and Kern County Rule 407

a. Well Vent and Flare (S-1129-385)

Compliance with these requirements was address in Section IX of this document and is assured by conditions 22, 32 and 33. Therefore, a permit shield is being granted in conditions 34 and 35.

b. Internal Combustion Engines (S-1129-692, -693, -694, -698, -699, -700)

Chevron U.S.A., Incorporated
Facility: S-1129
Project: 960999

Compliance with these requirements was address in Section IX of this document and is assured by conditions 1, 3, 4 and 5. Therefore, a permit shield is being granted in conditions [12 and 13](#).

XI. PERMIT CONDITIONS

See permit conditions beginning on the following page.

G:\PER\ENG\SHAFFERD\Title 5\S1129 CHEVRON U.S.A. (HEAVY OIL WESTERN)\FINAL #960999

Attachment A

Detailed Facility Printout

Attachment B

Insignificant Activities

Title V Application - INSIGNIFICANT ACTIVITIES

COMPANY NAME: Chevron U.S.A., Incorporated			FACILITY ID: S-1129		
Check the box next to the exemption category from Rule 2020 which describes any insignificant activity or equipment at your facility not requiring a permit.					
Exemption Category	Rule 2020 Citation	√	Exemption Category	Rule 2020 Citation	√
Structure or incinerator assoc. with a structure designed as a dwelling for 4 families or less	4.1		Containers used to store refined lubricating oils	6.6.8	√
Locomotives, airplanes, and watercraft used to transport passengers or freight	4.4		Unvented pressure vessels used exclusively to store liquified gases or assoc with exempt equipment	6.6.9 or 6.13	√
Natural gas or LPG-fired boilers or other indirect heat transfer units of 5 MMBtu/hr or less	6.1.1	√	Portable tanks used exclusively to store produced fluids for ≤ six months	6.6.10	
Piston-type i.c. engine with maximum continuous rating of 50 braking horsepower (bhp) or less	6.1.2	√	Mobile transport tanks on delivery vehicles of VOCs	6.6.11	
Gas turbine engines with maximum heat input rating of 3 MMBtu/hr or less	6.1.3		Loading racks used for the transfer of less than 4,000 gal/day of unheated organic material with initial boiling point ≥ 302 F or of fuel oil with specific gravity ≥ 0.8251	6.7.1.1	
Space heating equipment other than boilers	6.1.4	√	Loading racks used for the transfer of asphalt, crude or residual oil stored in exempt tanks, or crude oil with specific gravity ≥ 0.8762	6.7.1.2	
Cooling towers with a circulation rate less than 10,000 gal/min, and that are not used for cooling of process water, or water from barometric jets or condensers++	6.2	√	Equipment used exclusively for the transfer of refined lubricating oil	6.7.2	
Use of less than 2 gal/day of graphic arts materials	6.3		Equipment used to apply architectural coatings	6.8.1	√
Equipment at retail establishments used to prepare food for human consumption	6.4.1		Unheated, non-conveyorized cleaning equipment with < 10 ft² open area; using solvents with initial boiling point ≥ 248 F; and < 25 gal/yr. evaporative losses	6.9	√
Ovens at bakeries with total daily production less than 1,000 pounds and exempt by sec. 6.1.1	6.4.3		Brazing, soldering, or welding equipment	6.10	√
Equipment used exclusively for extruding or compression molding of rubber or plastics, where no plastisizer or blowing agent is used	6.5		Equipment used to compress natural gas	6.11	
Containers used to store clean produced water	6.6.1	√	Fugitive emissions sources assoc. with exempt equipment	6.12	√
Containers ≤ 100 bbl used to store oil with specific gravity ≥ 0.8762	6.6.2		Pits and Ponds as defined in Rule 1020	6.15	√
Containers ≤ 100 bbl installed prior to 6/1/89 used to store oil with specific gravity ≥ 0.8762	6.6.3		On-site roadmix manufacturing and the application of roadmix as a road base material	6.17	
Containers with a capacity ≤ 250 gallons used to store organic material where the actual storage temperature < 150 F	6.6.4	√	Emissions less than 2 lb/day from units not included above	6.19	√
Containers used to store unheated organic material with an initial boiling point ≥ 302 F*	6.6.5	√	Venting PUC quality natural gas from for sole purpose of pipeline and compressor repair and or maintenance	7.2	
Containers used to store fuel oils or non-air-blown asphalt with specific gravity ≥ 0.9042	6.6.6		Non-structural repairs & maintenance to permitted equipment	7.3	√
Containers used to store petroleum distillates used as motor fuel with specific gravity ≥ 0.8251	6.6.7	√	Detonation of explosives ≤ 100 lb/day and 1,000 lb/year	7.4	

☐ No insignificant activities (Check this box if no equipment in the above categories exist at your facility.)

Attachment C

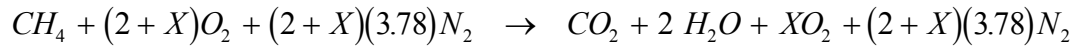
Current Permits

Attachment D

O₂/CO₂ Exhaust Concentrations

NATURAL GAS

Maximum PM emissions will occur at 0% O₂ in the exhaust stream and District Rule 4301 requires a 12% CO₂ correction. For natural gas firing units, 0% O₂ occurs at 12% CO₂. This is demonstrated by the following combustion equation for natural gas (wherein X denotes moles of excess air and (neglecting sulfur)).



Solving an expression for the fraction of O₂ in the exhaust by volume, wherein the numerator represents the number of moles of CO₂ and the denominator represents the total number of moles of dry exhaust, set equal to 12% CO₂ yields the number of moles of excess air (X).

$$\frac{1}{1 + X + (2 + X)3.78} = 0.12 \Rightarrow X = 0.05$$

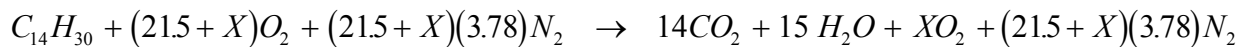
Substituting the coefficients and solving the resultant equation for the fraction of O₂ verifies that 12% CO₂ is equivalent 0% O₂:



$$\frac{0.05}{1 + 0.05 + 7.75} = 0.0057 \approx 0\%$$

FUEL OIL

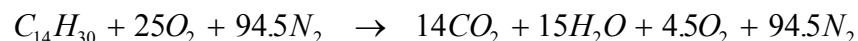
For units burning fuel oil the following combustion equation, wherein X denotes moles of excess air, reveals that 12% CO₂ in the exhaust stream occurs at 4% O₂. Consequently, the compliance of units firing on fuel oil is shown using AP42 F factors uncorrected from 0% O₂ to illustrate the worst case scenario.



Solving an expression for the fraction of O₂ in the exhaust by volume, wherein the numerator represents the number of moles of CO₂ and the denominator represents the total number of moles of dry exhaust, set equal to 12% CO₂ yields the number of moles of excess air (X).

$$\frac{14}{14 + X + (21.5 + X)3.78} = 0.12 \Rightarrow X = 4.5$$

Substituting the coefficients and solving the resultant equation for the fraction of O₂ in the exhaust verifies that 12% CO₂ is equivalent 4% O₂:



$$\frac{4.5}{14 + 4.5 + 94.5} = 0.039 \approx 4\%$$

Attachment E

EPA COMMENTS / DISTRICT RESPONSE

EPA COMMENTS / DISTRICT RESPONSE

The following EPA comments were received regarding the proposed Title V Operating Permit for Chevron U.S.A., Inc - Heavy Oil Western Oilfields (District facility #S-1129), formerly Texaco Exploration & Production. These comments are encapsulated below followed by the District's response. A copy of the EPA 05/06/02 comment letter is available at the District.

1. PREVENTION OF SIGNIFICANT DETERIORATION (PSD):

A. EPA Comment

The District's evaluation for Texaco (page 21) states that the District was not able to identify which units were subject to EPA's 1999 revised PSD permit limits (SJ 78-16 and SJ 78-17), and did not include any PSD permit requirements in the permit (such as 0.005 lbPM10/MMBtu; 0.063 lb SO₂/MMBtu; and 0.0168 lb NO_x/MMBtu or 14 ppmvd @ 3% O₂). We recommend that the District work with EPA and Texaco to identify which units are subject to these and other PSD permit requirements on the list we provided the District and add them to the draft Title V permit.

District Response

Upon further review of PSD permit numbers SJ-78-16, SJ-78-17, and all available amendments submitted to the District, the District did not identify any equipment addressed in the PSD permits as resident at this facility. Therefore, it is the District's determination that SJ-78-16 and SJ-78-17 do not apply to this facility, and references to SJ-78-16 and SJ-78-17 have been removed from the Engineering Evaluation.

2. BOILER STEAM GENERATORS:

A. EPA Comment

SO_x Emissions:

Many of these units burning well vent/TEOR gas (for instance, Texaco units 16 and 24) are small (23 or 25 MMBtu/hr), but have source specific emission limits well over the major source levels for SO_x and far greater than allowed under the SIP. For instance, unit 26 is the smallest at 23 hr/hr and is permitted to emit 214 tons per year of SO_x based on an emission limit of 2.124 lb SO_x/MMBtu (condition 12) that far exceeds the Kern County Rule 424 SIP sulfur compounds emission limit of 0.11 lbs sulfur/MMBtu (condition 11). While the SIP allows averaging in certain circumstances, the permits do not contain any alternate operating scenarios to implement emissions averaging, and the source could not reach compliance by averaging if the emissions are as high as allowed under the permits for the units burning well vent/TEOR gas. Therefore, we recommend revising conditions 12 through 14 to comply with the SIP limit for SO_x emissions and reviewing any original PSD or ATC permits for additional requirements that apply to these units.

District Response

Although condition 12 does allow a higher level of SO_x emissions, condition 11 limits SO_x emissions to 0.11 lb/MMBTU to assure compliance with the SIP limit. Since the applicant did not propose to streamline the NSR and SIP rule limits, the District cannot remove or revise the NSR limits or requirements through Title V .

B. EPA Comment

We understand that the District is reviewing these permits to remove the averaging option for units that are not allowed to average, and we recommend including alternate operating scenarios for those units which Texaco would like to average.

District Response

The current permit condition language is based upon the SIP-approved rule and identifies which units are subject to averaging. The facility does have a list of all affected units on file and has included a copy. See [Attachment G](#).

C. EPA Comment

In addition, we recommend changing the first sentence to read, "sulfur compound emissions shall not exceed..." based on the underlying regulation (for instance, see rule 4406 section 4.0).

District Response

The District will revise condition 11 to read as follows:

Sulfur [compound](#) emissions shall not exceed 0.11 lb of sulfur per million BTU of heat input, averaged over 3 one-hour periods. Compliance with this requirement may be demonstrated by firing the unit only on PUC or FERC regulated natural gas; multiplying the reported sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit; or by a combination of source testing for sulfur compounds and fuel analysis. Compliance may be demonstrated for this unit individually, or by showing that the total emissions of sulfur compounds from all steam generators located at the stationary source with ATC or PTO issued prior to September 12, 1979 does not exceed the emissions that would result if each unit was operating in compliance with the specified limit. [Kern County Rule 424; District Rules 2520, 9.3.2 and 4406]

D. EPA Comment

If no SO_x controls are required to meet these limits, we recommend revising the level of monitoring based on the major quantity of emissions that may occur. For instance, there is no specified source of vapor recovery gas, so emissions may vary significantly and vapor recovery gas will contain several orders of magnitude more sulfur than PUC regulated natural gas. We recommend sulfur testing of vapor recovery gas no less frequently than monthly, as listed in PSD permits SJ 78-16 and SJ 78-17 for the facility, or daily for high sulfur streams (see Neuvo Energy units 352 and 353).

District Response

Many District permits identify “vapor recovery gas” as a fuel source. For this reason, conditions 5, 6, 7, 8, 9, 10, and 11 are included in the initial Title V permit for unit -16 (and others) at this facility. These conditions require sulfur testing if the unit is fired on noncertified gaseous fuel. This would include combustion of vapor recovery gas. The District has determined that PSD permits SJ 78-16 and SJ 78-17 do not apply to this facility.

E. EPA Comment

Breakdown rule reference:

We recommend either replacing the general reference to Rule 1100 (for instance, condition 18 for unit 16 at Texaco) with the approved conditions (which are based on the approved underlying SIP) listing specific Rule 1100 requirements in conditions one and two in the facility-wide conditions, or omitting this condition. Otherwise the source might mistakenly believe that non-approved sections of Rule 1100 apply to them.

District Response

The source is subject to all parts of District Rule 1100, for Federal and District compliance. The condition is based upon SIP-approved District NSR Rule. The District will revise condition 18 of permit -16 (and similar conditions at this facility) to read as follows:

Should source testing indicate an emission factor higher than that approved, the operator shall comply with [District Rule 1100](#), [Kern County Rule 111](#), and, if necessary, submit an application for Authority to Construct to incorporate the higher emission factor into the SLC. [District NSR Rule]

F. EPA Comment

Testing and Averaging Times:

We agree with the requirement for portable analyzers to measure NO_x and CO emissions, and recommend specifying calibration with Protocol 1 gas before each use. (For instance, condition 15 in several Texaco BSG permits).

District Response

The District will revise condition 15 of permit -16 (and similar conditions at this facility) to read as follows:

The stack concentration of NO_x (as NO₂), CO, and O₂ shall be measured at least on a monthly basis using District approved portable analyzers. The portable analyzer shall be calibrated prior to each use with a two-point calibration method (zero and span). Calibration shall be performed with certified calibration gases. [District Rule 2520, 9.3.2]

G. EPA Comment

We also agree with the requirement for source testing, and recommend an averaging time based on the length of the sampling runs. (For instance, Texaco BSG 16 condition 12) Also, “ASTM D3246 or double GC for H₂S and mercaptans is listed in the permit. The conditions should spell out “GC” and explain a reference for the Gas chromatograph method.

District Response

The District will revise condition 35 of permit -16 (and similar conditions at this facility), and add one additional condition to read as follows:

Emissions from this unit shall be calculated using the arithmetic mean, pursuant to District Rule 1081 (12/16/93), of three 30-minute test runs for NO_x and CO. These means shall be multiplied by the appropriate factor to determine compliance with the emission limits. [District Rules 2520, 9.3.2 and 4305]

And:

Stack gas velocities for source test purposes shall be determined using EPA Method 2. [District Rule 1081]

3. FUGITIVE DUST RULES:

EPA Comment

We agree with the inclusion of fugitive dust rules in the proposed Texaco permit. The proposed permit contains a gap between end of April, and May 15th (conditions 65-74) for fugitive dust rules. However, these rules state (for instance, see Rule 8030 section 2.0) that the current rules will not expire on April 30 unless the new rules are effective, and the permit states that the new rules are not effective until May 15th. Therefore, we recommend dropping the reference to the older rule and just stating that the current rule is required (since the permits will likely be issued after May 15th) or eliminating this gap.

District Response

Conditions 31 through 35 on the facility wide requirements (-0 permit) replace the general permit template conditions for Regulation VIII requirements (conditions 31, 32 and 33).

4. TEXACO TURBINES:

EPA Comment

We recommend verifying appropriateness of the acid rain permit shields when issuing source-specific permits (for example, see unit 47 condition 13), as we have found that some units constructed prior to the issuance of Title V templates are actually subject to the acid rain program.

District Response

The following permit conditions, including their underlying applicable requirements, originate from model general permit templates and are not subject to further EPA and Public review:

Conditions 1 through 30 and 36 through 41 of the Facility Wide Requirements (S-1129-0)
Conditions 1 through 21 of the requirements for permit units S-1129-47, -48 and -49
Conditions 1 through 22 of the requirements for permit units S-1129-53, -54 and -55

EPA Comment

We appreciate the local PTOs for these Texaco units, but these PTOs do not clarify the NO_x limits in the original NSR permits for these units. Please send us the original ATC permits for the NO_x emission rates at the 48.7 MMBtu/hr Allison model 501-KB-5 gas fired units 53, 54, 55 with 42 ppm NO_x (condition 38) limits in the proposed permits, as well as the ATC permits for the other Allison units with limits of 30 ppm. The information on the original ATCs, especially the date of issuance, will also help us provide you with information on any EPA PSD permits that were issued for these units.

District Response

Guidance provided by White Paper II allows states to issue federal operating permits based on existing (District issued) permits. District staff is not directed to look back into reviewing past New Source Review actions. The PSD permit provided to the District from EPA was illegible. The District is comfortable with issuing the Title V permit as proposed. If EPA requests to review the original ATCs, they should contact Tom Goff, Permits Manager South Region.

EPA Comment

Condition 39 does not define when the start-up/shut-down exemption applies. We recommend including a definition so that the emission limit will be more enforceable.

District Response

Start up and shut down exemptions do not apply to the emission of VOC from the turbine lube oil vent.

EPA Comment

We suggest streamlining the permit by removing the H₂S limits in the permit, which are significantly less strict than the requirement to fire natural gas (and if necessary, clarify that the sulfur limit includes all sulfur compounds including H₂S) in condition #1 for the permits.

District Response

Condition 1 identifies a sulfur content limit on a weight basis, condition 26 identifies a sulfur content limit on a volume basis, condition 28 identifies an hourly emission rate, condition 29 identifies the required federal emission limits on a dry volume basis, and condition 30 specifies a specific daily limit. All of these conditions specify different units of measure and cannot simply be removed from the permit. The facility has not proposed to streamline any of these requirements, and will demonstrate compliance with each of these limits on a regular basis.

5. TEXACO INTERNAL COMBUSTION ENGINES:**EPA Comment**

We were not able to find an evaluation of District Rule 4701 for internal combustion engines such as unit #692. Please include an evaluation of this rule and any applicable requirements in the final permit.

District Response

District Rule 4701 received approval into the SIP only after this evaluation was published for preliminary review. All conditions based upon District Rule 4701 are now correctly identified as "Federally Enforceable Through Title V".

6. TEXACO WELLS:**A. EPA Comment**

The proposed Texaco Title V permit allows the use of API emission factors to determine compliance. Rule 4401 requires that any factors must be as strict as EPA-approved emission factors for determining compliance with emission limits, and section 6.4.4 contains a specific emission factor that may be superseded only with District, CARB, and EPA approval. Therefore, the District cannot allow the use of an industry emission factor to determine compliance with these federally enforceable requirements unless it has been approved by EPA. For example, we believe that the previous Texaco permit S-1141 and the Nuevo proposed permit require the use of appropriate emission factors and recommend similar permit conditions for this Texaco permit.

District Response

The condition is based upon District NSR Rule, and therefore cannot be modified through the Title V process. The language of this condition is comparable to language of similar Title V permit conditions at other similar Title V facilities in the district. Refer to S-1246-283-1 and S-1326-35-3.

B. EPA Comment

Also, monitoring is proposed for only 20% of the components annually at this Texaco facility. We believe that annual component monitoring is necessary to determine compliance with District Rule 4401 because the emission limit (section 5.3) is based on the total number of leaks at the facility and monitoring only 20% of the components would not establish whether the facility is in compliance with this limit. (Unit 386 condition 14). For instance, District Rule 4407 provides a benchmark for well monitoring (although it apply to different wells). It contains a minimum monitoring frequency of annual emissions if the facility demonstrates good performance, and otherwise quarterly monitoring. While District Rule 4407 is designed for an alternative type of well, it provides a useful benchmark for monitoring frequency. In addition, we believe that current permit issued by the Southern Region require annually monitoring for fugitives, as does the proposed permit for Nuevo Energy.

District Response

The comparison of in-situ well vents to enclosed well vents by the EPA is not valid. Rule 4401 requires the entire system perform to 99% collection and control efficiency. District compliance policy recommends 20 percent of all well vents tested annually. Furthermore, the requirement to monitor 20% of the components is identical to requirements at other Title V facilities in the district, S-1128 and C-311 for example. It is also similar to monitoring other fugitive sources permitted by the District.

7. MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY (MACT):

EPA Comment

The permit for Texaco appears to have originally contained a general condition (#45) to verify that the facility is not subject to MACT. However, the proposed permit contains an indication that condition #45 may or may not be struck-out from the permit. Please clarify how the permit will assure compliance with MACT requirements.

District Response

Based upon a telephone conference with Greg Nizich and Ed Pike of the EPA, and Martin Keast and Carlos Garcia of the District, on November 8, 2001, an initial determination and permanent record of API test results for determination will satisfy the MACT requirement. Since this facility is verified to be a heavy oil production facility, the requirements of 40 CFR 63, Subpart HH do not apply. The discussion in the Engineering Evaluation, above, has been revised.

Attachment F

PUBLIC COMMENTS / DISTRICT RESPONSE

PUBLIC COMMENTS / DISTRICT RESPONSE

Public comments were received from Chevron U.S.A., Inc (Chevron), District facility #S-1129, formerly Texaco Exploration & Production. These comments are encapsulated below followed by the District's response. A copy of the Chevron U.S.A., Incorporated 04/26/02 comment letter is available at the District.

CHEVRON U.S.A., INC. COMMENT — GENERAL COMMENTS REGARDING TITLE V PERMIT CONDITIONS

The attachment includes comments on specific permit conditions for which we have concern:

- a. Chevron requests that EPA Methods 6 and 6A be added to the list of usable test methods in condition 7 of the heater treater units.
- b. Chevron requests that EPA Methods 6, 6A and 6C be added to the list of usable test methods in condition 7 of the steam generator units.
- c. Based on previous correspondence, Methods 6C should be added to steam generator conditions. Additionally, Methods 6 and 6A should also be added since they are also EPA methods.
- d. Fixed roof tanks with a capacity of 471 barrel or less are not affected by Rule 4623. Additionally, Section 6.1.1 of Rule 4623 only requires record keeping for equipment that is subject to the requirements of the rule. Since fixed roof tanks with a capacity less than 471 barrels are not subject to any requirements, conditions to determine TVP should be removed from tanks that are less than 471 barrels.
- e. Since we may not receive 'gas bills' through our accounting system, Chevron proposes the following language, 'If the turbine is fired on PUC-regulated natural gas, then maintain on file copies of natural gas bills, or other documentation as appropriate.' This would allow for contracts and operators logs to show compliance.
- f. Gas turbine permit units 53, 54, 55 fire on natural gas with a maximum limit of 19.5 and 15 ppm H₂S. Since this is a more stringent limitation, please remove condition 20. The District has removed this condition on other gas fired turbine permits.
- g. 40 CFR Part 60, Spec. 2 is a performance specification for SO₂ and NO_x Continuous Emissions Monitors, not predictive emissions monitoring systems. This condition must be removed since there is no way for Texaco to comply with a condition requiring us to meet performance requirements for CEM when the condition is predictive. Additionally, Rule 4703 Section 6.2.1 only requires that we measure and record control system operating parameters and elapsed time of operation. Since these units are less than 10MW, NO_x monitoring is not required.

DISTRICT RESPONSE

- a. The District will revise heater-treater condition 7 to read as follows
When complying with SO_x emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months using EPA Method 6, 6A, 6B, 6C or Method 8; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by GC-FPD/TCD performed in the laboratory and EPA Method 19 to calculated emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every thirty-six months; however, annual source testing shall resume if any test fails to show compliance. [District Rule 2520, 9.3.2]
- b. The District will revise steam generator condition 7 to read as follows
When complying with SO_x emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months using EPA Method 6, 6A, 6B, 6C or Method 8; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by GC-FPD/TCD performed in the laboratory and EPA Method 19 to calculated emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every thirty-six

months; however, annual source testing shall resume if any test fails to show compliance. [District Rule 2520, 9.3.2]

- c. The District will revise steam generator condition 7 to read as follows
When complying with SOx emission limits by testing of stack emissions, testing shall be performed not less than once every 12 months using EPA Method 6, 6A, 6B, 6C or Method 8; or, for units using gaseous fuel scrubbed for sulfur pre-combustion, a grab sample analysis by GC-FPD/TCD performed in the laboratory and EPA Method 19 to calculated emissions. Gaseous fuel fired units demonstrating compliance on two consecutive annual source tests shall be tested not less than once every thirty-six months; however, annual source testing shall resume if any test fails to show compliance. [District Rule 2520, 9.3.2]
- d. Section 6.1.1 also requires vapor pressure measurement. Although small tanks do not have applicable requirements under SIP Rule 4623, they are not exempt from the rule unless they meet the TVP limit. The District is aware that this is a heavy oil source, and is certain that oils stored in these small tanks has TVP less than 1.5. As long as ChevronTexaco tests the source going to all tanks (rather than testing the content of each tank), the requirement is satisfied. The District does not see the point of removing an exemption limit requirement when the permit unit is obviously exempt from the associated rule.
- e. The District will revise turbine condition 10 to read as follows:
If the turbine is fired on PUC-regulated natural gas, then the operator shall maintain a log describing the source of natural gas and the quantity used. [District Rule 2520, 9.3.2]

And the District will revise turbine condition 12 to read as follows:

Operator shall maintain a stationary gas turbine operating log that includes, on a daily basis, the actual local start-up and stop time, length and reason for reduced load periods, total hours of operation, source(s) of and quantity of fuel used, fuel sulfur content and fuel nitrogen content. [40 CFR 60.332(a), (b); District Rules 2520, 9.3.2 and 4703, 6.2.4]
- f. Since the turbines are fired on PUC-quality natural gas, extraneous fuel sulfur reporting will be removed from the permits.
- g. The District will remove extraneous predictive emissions monitoring conditions from the turbine permit unit requirements.

Attachment G

Current Kern County Rule 424 Compliance Plan

Title V Facility Contacts

Created On (Date): March 11, 2002

For (Facility name): Chevron USA, Incorporated
(DBA ID Number): S-1129

By (District Staff Person): Douglas Shaffer

Based on Information Provided by: Martin Lundy

Responsible Official

Name: G. P. Luquette
Title: Vice President
Telephone: _____
Address: _____

Contacts for Questions Regarding Application

Name: Martin Lundy
Title: Environmental Coordinator
Telephone: (661) 633 4458
FAX: () -

Send Draft Permits to:

Name: Martin Lundy
Title: Environmental Coordinator
Telephone: _____
FAX: _____
Address: 4900 California Ave.
Bakersfield, CA 93309

Send Proposed and Final Permits to:

Name: W. Brommelsiek
Title: Assistant Secretary
Telephone: _____
FAX: _____
Address: P O Box 1392
Bakersfield, CA 93302

Engineer Name	Douglas Shaffer
Engineer Initials	<Engineer's Initials>
Review Manager	Richard McVaigh
Facility's Regional Manager	Thomas Goff
Facility Name	Chevron USA, Incorporated
Facility #	S-1129
Project #	S-960999
Operation Description	Heavy Oil Western
Location	in western Kern County (west of I-5)
	The following should make sense: This is for its Heavy Oil Western in western Kern County (west of I-5), California.
Contact Receiving Final	W. Brommelsiek
Greeting Name	Mr. Brommelsiek
Mailing Address	P O Box 1392 Bakersfield, CA 93302
Newspaper	Bakersfield Californian
Did EPA have objections?	No
Were there any comments?	Yes
Preliminary Notice Date	March 22, 2002

Gerardo C. Rios, Chief
Permits Office (AIR-3)
U.S. EPA - Region IX
75 Hawthorne St.
San Francisco, CA 94105

**Re: Notice of Final Action - Title V Permit
District Facility # S-1129
Project # S-960999**

Dear Mr. Rios:

The District has issued the Final Title V Permit for Chevron USA, Incorporated. The preliminary decision for this project was made on March 22, 2002. A summary of the comments and the District's response to each comment is included as an attachment to the engineering evaluation.

The public notice for issuance of the Final Title V Permit will be published approximately three days from the date of this letter.

I would like to thank you and your staff for working with us. We appreciate your concurrence with this action. Should you have any questions, please contact Mr. Richard McVaigh, Permit Services Manager, at (559) 230-5900.

Sincerely,

Seyed Sadredin
Director of Permit Services

Attachments

C: Douglas Shaffer, Permit Services Engineer

Mike Tollstrup, Chief
Project Assessment Branch
Air Resources Board
P O Box 2815
2020 L St.
Sacramento, CA 95812-2815

**Re: Notice of Final Action - Title V Permit
District Facility # S-1129
Project # S-960999**

Dear Mr. Tollstrup:

The District has issued the Final Title V Permit for Chevron USA, Incorporated. The preliminary decision for this project was made on March 22, 2002. A summary of the comments and the District's response to each comment is included as an attachment to the engineering evaluation.

The public notice for issuance of the Final Title V Permit will be published approximately three days from the date of this letter.

I would like to thank you and your staff for working with us. Should you have any questions, please contact Mr. Richard McVaigh, Permit Services Manager, at (559) 230-5900.

Sincerely,

Seyed Sadredin
Director of Permit Services

Attachments

C: Douglas Shaffer, Permit Services Engineer

W. Brommelsiek
Chevron USA, Incorporated
P O Box 1392
Bakersfield, CA 93302

**Re: Notice of Final Action - Title V Permit
District Facility # S-1129
Project # S-960999**

Dear Mr. Brommelsiek:

The District has issued the Final Title V Permit for Chevron USA, Incorporated. The preliminary decision for this project was made on March 22, 2002. A summary of the comments and the District's response to each comment is included as an attachment to the engineering evaluation.

The public notice for issuance of the Final Title V Permit will be published approximately three days from the date of this letter.

Thank you for your cooperation in this matter. Should you have any questions, please contact Mr. Richard McVaigh, Permit Services Manager, at (559) 230-5900.

Sincerely,

Sayed Sadredin
Director of Permit Services

Attachments

C: Douglas Shaffer, Permit Services Engineer

**SAN JOAQUIN VALLEY
AIR POLLUTION CONTROL DISTRICT
NOTICE OF FINAL DECISION TO ISSUE
FEDERALLY MANDATED OPERATING PERMIT**

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District has made its final decision to issue the initial Federally Mandated Operating Permit to Chevron USA, Incorporated for its Heavy Oil Western in western Kern County (west of I-5), California.

The District's analysis of the legal and factual basis for this proposed action, project #S-960999, is available for public inspection at the District office at the address below. For additional information regarding this matter, please contact Mr. Richard McVaigh, Permit Services Manager, at (559) 230-5900, or contact Seyed Sadredin, Director of Permit Services, in writing at SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 1990 E. GETTYSBURG AVE, FRESNO, CA 93726-0244.

TITLE V PUBLIC NOTICE CHECKLIST

FACILITY ID: S-1129 PROJECT #: S-960999

✓ ✓
REQST. COMPL.

- ☐ ☐ Title V PRELIMINARY PUBLIC NOTICE
- ☐ ☐ Title V REVISED PROPOSED PUBLIC NOTICE
- ✓ ☐ Title V FINAL PUBLIC NOTICE
- ☐ ☐ Title V MODIFICATION PUBLIC NOTICE

ENCLOSED DOCUMENTS REQUIRE:

- ✓ ☐ Stamp current date on all letters and signature page of the evaluation.
- ✓ ☐ Send **FINAL** notice letters to CARB, EPA and applicant including the following attachments:
 - ✓ Engineering evaluation with attachments.
 - ✓ Public notice
- ✓ ☐ Send **FINAL** public notice for publication to: Bakersfield Californian.
- ✓ ☐ Send signed copies of all **FINAL** notice letters, engineering evaluation with attachments, and public notice to the following:
 - ✓ Douglas Shaffer, Permit Services Engineer
 - ✓ Thomas Goff, Permit Services Manager
- ✓ ☐ Enter "Mail Date" onto project record.
- ✓ ☐ Attach Compliance Assistance Bulletin "Title V Reporting Requirements" to the facility mailing.
- ✓ ☐ Email Chay Thao Engineering Evaluation.
- ✓ ☐ Other special instructions: Enter the mail date on project S-1020447

Date completed: July 19, 2002 By: Douglas Shaffer

San Joaquin Valley Air Pollution Control District

Final Engineering Evaluation

**Facility # S-1129
Chevron USA, Incorporated**

PREPARED BY:

**Douglas Shaffer
Air Quality Engineer**

REVIEWED BY:

**Richard McVaigh
Permit Services Manager**

APPROVED BY:

**Sayed Sadredin
Director of Permit Services**

FINAL DECISION DATE:
